IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

Civil Action No. 5:19-cv-249-FL

)	
MATTHEW BRADLEY,) DEFENDANT ANALYTIC	CAL
) GRAMMAR, INC.'S MOT	ION
Plaintiff,) FOR SUMMARY JUDGM	ENT
v.)	
)	
ANALYTICAL GRAMMAR, INC.,)	
)	
Defendant.)	
)	

Pursuant to Federal Rule of Civil Procedure 56, Defendant Analytical Grammar, Inc. ("Analytical") moves for summary judgment on both claims raised by Plaintiff Matthew Bradley ("Bradley") and on its corresponding counterclaims for declaratory judgment.

Summary judgment is proper in this case because there is no genuine issue of material fact and because Analytical is entitled to judgment as a matter of law.

The instant motion is based on the memorandum of points and authorities, statement of material facts, the appendix thereto, and the declarations and exhibits filed in support hereof; the papers on file in this matter; and on such other evidence or argument as the Court may consider in a hearing on this matter.

Dated: July 17, 2020

Respectfully submitted,

Analytical Grammar, Inc.

By its attorneys:

DAN BOOTH LAW LLP

/s/ Dan Booth

Daniel G. Booth 60 Thoreau Street, #121 Concord, MA 01742 dan@danboothlaw.com Local Civil Rule 83.1(e) Special Appearance

PARKER POE ADAMS & BERNSTEIN LLP

Christopher M. Thomas N.C. State Bar No. 31834 christhomas@parkerpoe.com PNC Plaza 301 Fayetteville Street, Suite 1400 (27601) P.O. Box 389 Raleigh, North Carolina 27602-0389 Telephone: (919) 835-4626 Facsimile: (919) 834-4564

Local Civil Rule 83.1(d) Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Albert P. Allan
ALLAN LAW FIRM, PLLC
435 East Morehead Street
Charlotte, NC 28202
Email: alallan@allaniplitigation.com

This the 17th day of July, 2020.

/s/ <u>Dan Booth</u>
Dan Booth
Dan Booth Law LLC
60 Thoreau Street, #121
Concord, MA 01742
<u>dan@danboothlaw.com</u>
Local Civil Rule 83.1(e) Special Appearance